

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

MINUTES OF PROCEEDINGS

HONORABLE JUAN M. PEREZ-GIMENEZ

DATE: September 15, 1999

COURTROOM DEPUTY: Lida Isis EGELE

CIVIL CASE: 98-2382 (PG)

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HELGA VALENTIN

Attorneys: Mario PABON  
Bruce BOWMAN (by phone)

vs.

UNITED HEALTHCARE PLAN,  
et al

Jaime TORO MONSERRATE  
Angélica TORO  
Rita VELEZ  
José RIVERA CORDERO  
Carlos MARTINEZ TEXIDOR  
Pedro CORDOVA

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SECOND STATUS CONFERENCE held in chambers. The Court is informed that the depositions anent jurisdiction were taken. Once the transcripts are received, as well as some documents that were requested during the depositions, the defendants will know if they will move to dismiss for lack of jurisdiction or not. Some of the requested documents are in Florida, they are personal letters. They need at least 20 days to obtain them. The plaintiffs are granted until October 15 to produce the documents. The personal letters will be produced under seal for an in camera reading by the Court. As to the documents in PR: a relief was provided by the plaintiffs so that the defendants may obtain them. The defendants are granted until November 15 to file the motion to dismiss, if any.

The reports of plaintiffs' experts have been submitted. The plaintiffs have experts on these fields: a surgeon, a gastroenterologist, a registered nurse, an economist and maybe on rehabilitation. Their curriculum vitae have not been submitted. The defendants argue that the reports are not in compliance with Rule 26 and they request final reports in order to take the

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experts' depositions. The plaintiffs want to take the defendants depositions first, and they will submit the reports with plenty of time before the depositions of the experts. Mr. Bruce Bowman will consult with his experts on economy and rehabilitation to see when they will have the final reports. As to the other experts the Court sets March 13, 2000, as the deadline to produce the final reports. The parties reserved December 13, 1999, and January 13, 14, and 15, 2000, for the defendants' depositions. The depositions of the nurse, surgeon and gastroenterologist will be taken during the week of April 17, 2000.

On September 20, at 10:30 AM, the deposition of a representative of United Health Care Plans will be taken, in the offices of McConnell.

The defendants have filed a united motion for summary judgment. The plaintiffs have until September 24 to respond. They want to take the defendants' depositions before responding to the motion for summary judgment.

Defendant Victor Ortiz has answered all interrogatories, requests for production of documents and requests for admissions. Defendants Victor Ortiz, Phico Insurance, Normando Durán, Luis Ramirez Ferrer and Juan Diaz Troche, request that the Court compel plaintiffs to answer the interrogatories they submitted on May 19, 1999. A final term until October 1, 1999, is granted to the plaintiffs to answer these interrogatories.

The plaintiffs will desist their cause of action as to defendants Dr. Carlos Estevez and Dr. Ramón Ramírez Ronda.

**A third status conference is set for December 14, 1999, at 8:30 A.M.**



Linda Isis EGELE  
Courtroom Deputy

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s/c: Antonio Moreda, Craig Bowman, Jaime Toro, José Vivas, José Otero, José Rivera, Carlos Martinez Texidor, and Pedro Córdova.

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